

15:00:01 1 equipment, they have records of all the equipment and
00:03 2 what have you, and they assign relay racks in the
15:00:09 3 central office and they -- you know, that type of thing.
15:00:17 4 And they put it together for a trans --

15:00:19 5 Q. But isn't it the case that on certain fibers
15:00:22 6 you're going to get information on the DB loss from the
15:00:26 7 splices of that fiber, correct?

15:00:27 8 A. We don't get information on the DB losses, no.

15:00:31 9 Q. The transmission engineer gets that?

15:00:33 10 A. She must, yeah -- they might. I don't know
15:00:36 11 that.

15:00:36 12 Q. But presumably you need a very good fiber for
15:00:41 13 maybe an OC-192, where you need a lesser fiber with more
0:00:47 14 DB loss for an OC-3, right?

15:00:50 15 A. Yes.

15:00:50 16 Q. And do they take that into account when
15:00:53 17 they're designing their layout?

15:00:54 18 MR. HARTLEY: Object to form.

15:00:55 19 A. I do not know that.

15:00:56 20 Q. Okay. Who's responsible for making sure that
15:01:03 21 equipment will actually work on the fiber that it's
15:01:07 22 being put on?

15:01:08 23 A. When they're doing the testing, we have a pair
15:01:12 24 gain turnup crew that gets everything working, turns up
01:19 25 the equipment and does their testing.

15:01:22 1 Q. What do you call that?

01:23 2 A. A pair gain turnup crew is what we have been

15:01:28 3 calling it.

15:01:28 4 Q. Pair gain?

15:01:30 5 A. That's not the official title of that group.

15:01:33 6 I've been calling it that for so many years.

15:01:37 7 Q. How do you spell pair gain?

15:01:40 8 A. It's P-A-R -- P-I -- I'm tired, I'm sorry.

15:01:44 9 P-A-I-R, G-A-I-N. I've been calling it that, but it's

15:01:50 10 not -- that's not their official title.

15:01:53 11 Q. Do you know what their title is --

15:01:56 12 A. Like I said, I'm brain dead. I'm very tired.

15:02:24 13 Q. Do you take customer forecasts into

15:02:28 14 consideration when you're deciding what size fiber cable

15:02:31 15 to use?

15:02:33 16 A. Yes.

15:02:33 17 Q. Is that helpful to you?

15:02:35 18 A. Yes.

15:02:37 19 Q. Is it more difficult to figure out the right

15:02:40 20 size when you don't have the customer forecast?

15:02:42 21 A. Yes.

15:02:52 22 Q. Have you had sales personnel pick up the phone

15:02:55 23 and call you at times and ask you what facilities are

15:03:03 24 available?

15:03:03 25 A. Yes.

15:03:04 1 Q. And do you tell them on those occasions?

15:03:07 2 A. Facilities available as to what kind of
15:03:09 3 facilities at a specific location?

15:03:12 4 Q. You tell me, what do they call and ask about
15:03:17 5 typically?

15:03:17 6 A. Okay. Typically they'll call and ask if, you
15:03:19 7 know, there's fiber in a location, is there enough
15:03:28 8 facilities for a large customer, that type of thing.
15:03:34 9 Mainly they're concerned with a customer moving into a
15:03:36 10 location that won't have adequate facilities.

15:03:44 11 Q. Have you ever gotten one of these calls from
15:03:50 12 sales and marketing asking if facilities exist and
15:03:54 13 checked for them the nearest facilities that would
15:03:56 14 exist, since there weren't the facilities that they
15:04:01 15 wanted?

15:04:01 16 A. For fiber, they'll ask if fiber cable is close
15:04:05 17 by.

15:04:06 18 Q. And --

15:04:07 19 A. And I'll say yes. Tell them yes.

15:04:09 20 Q. And what does that mean that it's close by?

15:04:12 21 A. It's -- like if it's running down the street
15:04:14 22 that the building happens to be on. I'll say there's
15:04:19 23 fiber in the area.

15:04:20 24 Q. Or you check the closest RT or something like
15:04:22 25 that?

15:04:23 1 A. I usually just say -- tell them it's, you
04:26 2 know -- if I have fiber running down the street or, you
15:04:30 3 know, the closest location where fiber is.

15:04:32 4 Q. Is that difficult to do?

15:04:34 5 A. No.

15:04:41 6 Q. Is it SWBT's policy when it deploys fiber in
15:04:46 7 the field to splice all fiber all the way through for
15:04:49 8 end-to-end connectivity?

15:04:51 9 A. No.

15:04:51 10 Q. How would you describe the policy?

15:04:53 11 A. Well, we usually splice the fibers that are
15:04:56 12 needed. Like the planning, when the planner deploys a
15:05:01 13 plan, we splice the fiber counts that are on the plan or
15:05:05 14 we splice the fiber counts for the service. We don't
15:05:10 15 usually splice all the fibers. Like 144 fiber, we do
15:05:14 16 not splice it end to end 144.

15:05:17 17 Q. Is it more of a just-in-time engineering
15:05:20 18 program, where you splice as the customers need it?

15:05:25 19 A. Yes and no. Sometimes if we are deploying a
15:05:30 20 planning fiber, they taper, you know, we will taper at
15:05:34 21 one street to another street to another street for
15:05:37 22 future deployment down that street.

15:05:40 23 Q. Uh-huh.

15:05:41 24 A. So if it -- if it's a circumstance where we
15:05:44 25 have fiber cable to a customer, we will usually only

15:05:48 1 splice in the fibers that are requested. Sometimes we
15:05:54 2 will splice in more than needed if we feel that there's
15:05:57 3 a future need for those fibers, like a forecast, you
15:06:01 4 know.

15:06:02 5 Q. So you allow yourself a little buffer based on
15:06:05 6 future anticipated need of the customer?

15:06:07 7 A. Correct.

15:06:07 8 Q. Generally you're not going to splice unless
15:06:09 9 you see a need, either currently or very near future?

15:06:14 10 A. Right. Just depends on the circumstance.

15:06:23 11 Q. Explain the tapering process to me.

15:06:26 12 A. Where you splice. You go from -- say you
15:06:29 13 start out from the central office at 144 fibers, you
15:06:33 14 reach a certain street and you designate that 48 of
15:06:38 15 those fibers are going to go down that street.

15:06:41 16 Q. Uh-huh.

15:06:41 17 A. So you don't -- you stop those 48 fibers at
15:06:45 18 that point and continue on with the rest of the fibers
15:06:49 19 until you hit the next street, then you designate so
15:06:53 20 many fibers to go down that street, et cetera.

15:07:06 21 Q. In the fibers that you leave tapered off for a
15:07:12 22 street, just as in that manhole, are they -- do they sit
15:07:17 23 there until the distribution cable is laid to join them
15:07:20 24 going?

15:07:24 25 A. Yes, they will just -- they will lay there,

15:07:27 1 right, until we pick them up with a -- you know, like a
15:07:30 2 sold case. Say we have a sold case for services at a
15:07:34 3 particular location. We will place the fiber cable or
15:07:37 4 if we have existing fiber cable, we'll activate those
15:07:43 5 fibers and extend them down to the location where we
15:07:46 6 need them.

15:07:47 7 Q. But for the ones you sort of stop at that
15:07:50 8 manhole for that street, those are at least stranded?

15:07:55 9 A. Yes.

15:07:56 10 Q. Those would be considered stranded fibers?

15:07:58 11 A. Yes.

15:07:58 12 Q. Now, explain to me why it makes sense to
15:08:04 13 strand fibers.

15:08:05 14 A. For future use, so you can deploy them where
15:08:10 15 needed.

15:08:11 16 Q. Uh-huh. Is stranding of fiber something
15:08:15 17 that's commonly done in SWBT's network deployment?

15:08:26 18 A. Yes.

15:08:34 19 Q. What is your definition of dead count?

15:08:40 20 A. Count that has not been spliced through, that
15:08:44 21 it's totally without any CO designation on it
15:08:47 22 whatsoever, meaning if you have --

15:08:51 23 Q. It's been deployed in the field, fiber that's
24 been deployed in the field?

15:08:54 25 A. Right.

15:08:54 1 Q. May or may not need splicing, right?

08:56 2 A. Right.

15:08:57 3 Q. It could be unused and already be spliced

15:09:01 4 through, though?

15:09:02 5 A. That's very unlikely. We don't splice --

15:09:06 6 usually splice through dead fiber counts.

15:09:10 7 Q. Okay. So dead count or dark fiber, as it's

15:09:13 8 called --

9 A. Uh-huh.

15:09:14 10 Q. -- in your mind is typically unspliced?

15:09:17 11 A. Right.

15:09:17 12 Q. And that's the normal way SWBT does it?

15:09:25 13 A. Right. Now, it's not to say that there aren't

15:09:35 14 cases where they haven't been spliced through, but

15:09:38 15 normally they're not.

15:09:45 16 Q. You work on a regular basis with DWOs and

15:09:48 17 PLRs, correct?

15:09:50 18 A. Yes.

15:09:50 19 Q. And DWO lists an entire job that needs to be

15:09:53 20 done, correct?

15:09:54 21 A. Uh-huh.

15:09:55 22 Q. That job may have various steps, correct?

15:09:57 23 A. Correct.

15:09:59 24 Q. And what is SWBT policy in terms of when that

10:03 25 DWO is supposed to get posted to the PLR?

15:10:05 1 A. It depends. There isn't a policy. There's
15:10:12 2 preposting and there's final posting. Final posting can
15:10:18 3 take years, depending -- but preposting, that's
15:10:24 4 internal, that we post our jobs, our DWOs to our NPLRs,
15:10:32 5 and that varies from drafting clerk to drafting clerk.
15:10:35 6 It depends on the workload. It depends on a number of
15:10:38 7 factors, but I don't supervise the drafting clerks,
15:10:44 8 so...

15:10:45 9 Q. Is preposting, posting of the DWO information
15:10:49 10 to the PLR before the job is complete?

15:10:51 11 A. No.

15:10:51 12 Q. What is preposting?

15:10:53 13 A. Preposting is something that a drafting clerk
15:10:56 14 does when she has time to update our records for our
15:11:01 15 internal use.

15:11:01 16 Q. Which records?

15:11:02 17 A. NPLR records. We have copies of the NPLRs in
15:11:07 18 our office and our drafting clerks will post to the
15:11:12 19 NPLRs.

15:11:13 20 Q. Are those PLRs different from the main PLRs?

15:11:19 21 A. They are the same in the respect that we get
15:11:26 22 them -- a new set of them every year, and the -- ours is
15:11:32 23 a stagnant copy, whereas the main NPLRs are always
15:11:39 24 changing, updating, jobs are getting closed and going on
15:11:43 25 the records.

15:11:44 1 Q. So which is going to be more current?

11:45 2 A. Our NPLRs are going to be more current.

15:11:49 3 Q. Ours being --

15:11:51 4 A. The ones in our office.

15:11:52 5 Q. The OSP engineer's office?

15:11:53 6 A. Yes.

15:11:54 7 Q. Which ones do you show to El Paso?

15:11:56 8 A. The ones we have in the office.

15:11:58 9 Q. Yours --

15:11:59 10 A. Our Southwestern Bell office, our engineering

15:12:02 11 office.

15:12:03 12 Q. The ones that are most current?

15:12:05 13 A. The ones that are most current.

15:12:07 14 Q. Okay. But you said many DWOs don't get

15:12:11 15 preposted, correct?

15:12:13 16 A. That's correct.

15:12:14 17 Q. Some are not posted until well after the job

15:12:18 18 is done?

15:12:18 19 A. That is correct.

15:12:19 20 Q. Well after the job is completed?

15:12:22 21 A. Correct.

15:12:22 22 Q. I think you said some even take years?

15:12:25 23 A. That --

15:12:26 24 MR. HARTLEY: Object to form.

15:12:26 25 A. The years have a tendency to be toward the

15:12:31 1 final, the main NPLR location, where you have the final
15:12:35 2 posting. In our office it depends on, like I said, the
15:12:41 3 workload of the clerk and when the clerk can get around
15:12:44 4 to posting it due to workload and what have you, and it
15:12:48 5 varies from clerk to clerk.

15:12:51 6 Q. Have you seen occasions where jobs have
15:12:52 7 been -- steps on DWOs have been completed but the DWOs
15:12:56 8 have not been posted to the PLRs?

15:12:58 9 A. Yes.

15:12:59 10 Q. Have you seen jobs where the DWOs -- well,
15:13:03 11 even though the DWO is not complete, that service is
15:13:07 12 running over a portion of the circuit on the DWO?

15:13:12 13 A. The job is not complete? Okay, if it's a very
15:13:16 14 large job and a portion of that job gets completed, yes,
15:13:22 15 services can be working over that portion and the job
15:13:24 16 not complete, yes.

15:13:26 17 Q. And in that situation it's also possible that
15:13:30 18 the -- that that portion of the DWO would not have been
15:13:34 19 put into the PLRs yet?

15:13:36 20 A. Correct. But if someone were to look in our
15:13:53 21 PLRs and the job not be posted, the job could be posted
15:13:57 22 to reflect the information on the -- to the NPLRs.

15:14:01 23 Q. It's possible that could happen?

15:14:02 24 A. Oh, yes. We could have that done. You know,
15:14:05 25 if somebody needs the information, we could take our DWO

15:14:08 1 and post the particular information needed to the NPLR
14:12 2 at that time, because some of our -- some of our jobs
5:14:21 3 contain customer information that would be considered
15:14:24 4 proprietary.

15:14:34 5 THE WITNESS: Can I have two seconds.

6 MR. CRAWFORD: Sure. Need to take a
7 break?

8 THE WITNESS: Yeah.

15:14:36 9 (Recess 3:14 to 3:20 p.m.)

15:20:30 10 Q. Ms. Rossman, getting back on the record.

15:20:35 11 A. Okay.

15:20:38 12 Q. Can you recall occasions when a SWBT
15:20:42 13 salesperson asked you for certain route or path
15:20:47 14 information on a circuit or fiber because they wanted to
15:20:49 15 give that information to the customer?

15:20:52 16 A. If a salesperson asked me for route
15:20:59 17 information, it would be on that specific customer. You
15:21:05 18 know, how the route goes to their specific location.

15:21:09 19 Q. Right, a circuit?

15:21:12 20 A. Right.

15:21:12 21 Q. A circuit purchased by the customer is what
15:21:15 22 I'm talking about.

15:21:16 23 A. A circuit purchased by the customer, if they
15:21:18 24 want to know the route. Yes, they've asked for that.

15:21:22 25 Q. And path. And that's the information you will

15:21:24 1 give to the customer, correct?

21:25 2 A. Yes. It's a stick diagram.

15:21:28 3 Q. You'll give a stick diagram that will show the

15:21:32 4 general route with the nodes involved?

15:21:37 5 A. The one from like Richardson to Diamond will

15:21:41 6 show a general path to their location.

15:21:54 7 Q. And if -- so you'll give that information to

15:21:59 8 the marketing person to give to the customer in that

15:22:01 9 situation?

15:22:02 10 A. Correct.

15:22:03 11 Q. Do you find more and more customers are more

15:22:08 12 sophisticated and they want this information than in the

15:22:11 13 old days?

15:22:12 14 A. Actually I had more requests in the old days

15:22:15 15 than I do now.

15:22:16 16 Q. Are more people requesting diversity now?

15:22:19 17 A. Yes.

15:22:21 18 Q. Okay. Why do you think that is?

15:22:23 19 A. For protection. I think the high tech data

15:22:27 20 services now are much more critical than they used to be

15:22:33 21 in the past and they want to protect their services, and

15:22:36 22 it's only logical that they would want to do that

15:22:39 23 because they lose money if their services and circuits

15:22:42 24 go down.

15:22:43 25 Q. If EPN wanted to get the same type of route.

15:22:47 1 information to give to one of its customers for dark
:22:51 2 fiber route, for instance, that it purchased from SWBT,
15:22:54 3 would it be able to get that information, also?

15:22:57 4 A. I don't know.

15:22:59 5 Q. If EPN requested it, would you provide it?

15:23:07 6 A. If EPN wanted to know the route of their
15:23:11 7 location where they were at that -- at that specific --
15:23:15 8 a specific location where you were -- EPN was in, yes.

15:23:21 9 Q. Right, if EPN purchased or leased from SWBT
15:23:28 10 some fiber going from a CO to two different buildings,
15:23:33 11 would you provide a stick map drawing to them of that?

15:23:42 12 A. Now --

15:23:46 13 THE WITNESS: Can I have a moment,
:23:48 14 please.

15:23:48 15 MR. HARTLEY: Sure.

15:23:49 16 (Discussion held between the witness and
15:23:51 17 Mr. Hartley.)

15:24:37 18 A. Well, what's confusing to me is I read an
15:24:40 19 e-mail just this morning that -- and I don't know -- I
15:24:43 20 was in a hurry and I don't know whether I read it
15:24:46 21 complete enough or good enough, that we aren't supposed
15:24:57 22 to give stick maps out anymore, but I do not know if I
15:25:01 23 read it correctly.

15:25:03 24 Q. Uh-huh.

.25:03 25 A. I read something this morning that said that

15:25:08 1 and I don't know if that's the case, but it's in my
15:25:13 2 mind, and that's what I thought I read, so I would have
15:25:18 3 to go back and reread the e-mail.

15:25:21 4 Q. Right.

15:25:21 5 A. That we weren't supposed to give out the stick
15:25:25 6 diagram.

15:25:25 7 Q. Let me be clear. In the last six months if
15:25:28 8 EPN had requested a stick map of some fiber it had
15:25:33 9 leased from SWBT, would you have provided that?

15:25:35 10 A. Yes.

15:25:36 11 Q. If someone said, I -- hey, I need a stick
15:25:39 12 map -- if a SWBT employee said --

15:25:43 13 A. It would be a very general stick map, but
15:25:46 14 it -- very crude and it just --

15:25:48 15 Q. I think I've seen the same ones you're talking
15:25:51 16 about.

15:25:51 17 A. Okay.

15:25:51 18 Q. If a high level SWBT person said, Sally, we
15:25:55 19 need a stick map showing all fiber in Dallas, how -- how
15:26:06 20 long would it take you to pull that down?

15:26:09 21 A. I wouldn't be privy to that information.

15:26:11 22 Q. How about Richardson CO?

15:26:18 23 A. Maybe -- I don't know -- I don't know.

15:26:24 24 Q. Could you get it --

15:26:26 25 A. It depends to the extent they wanted the fiber

15:26:31 1 and what they wanted it for and how they wanted it,
15:26:34 2 and -- it would depend on a number of things.

15:26:37 3 Q. A stick map of all interoffice fiber in
15:26:43 4 Richardson?

15:26:44 5 A. In the entire routes? How do they want it?
15:26:47 6 Do they want every single fiber cable coming from the
15:26:51 7 central office and going -- or do they want just the
15:26:53 8 routing of --

15:26:54 9 Q. Just the routing, single line.

15:26:56 10 A. Single line routing.

15:26:57 11 Q. No count.

15:26:58 12 A. Probably a couple of days.

15:27:00 13 Q. A couple of days to put that together just for
15:27:02 14 Richardson?

15:27:03 15 A. Well, it depends on the workload we have got.
15:27:06 16 You know, I mean -- but perhaps a day.

15:27:13 17 Q. Okay.

15:27:33 18 MR. CRAWFORD: Ms. Rossman, I think that
15:27:34 19 is all we have for you today.

15:27:36 20 THE WITNESS: Okay.

15:27:38 21 MR. CRAWFORD: That's the good news.

15:27:39 22 THE WITNESS: That is the good news.

15:27:42 23 MR. CRAWFORD: See, relatively painless.

15:27:45 24 MR. HARTLEY: Now what's the bad news?

15:27:52 25 MR. CRAWFORD: Knock yourself out.

15:27:57 1 MR. HARTLEY: We are not going to ask her
27:58 2 any questions now.

15:28:01 3 MR. CRAWFORD: Thank you so much for your
15:28:03 4 time, Ms. Rossman.

5 (Deposition adjourned at 3:28 p.m.)
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	CHANGES AND SIGNATURE			
2	WITNESS NAME: SALLY ROSSMAN			
3	PAGE	LINE	CHANGE	REASON
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1 I, SALLY ROSSMAN, have read the foregoing
2 deposition and hereby affix my signature that same is
3 true and correct, except as noted above.
4

5 _____
6 SALLY ROSSMAN

7 THE STATE OF _____)

8 COUNTY OF _____)
9

10 Before me, _____, on this
11 day personally appeared SALLY ROSSMAN, known to me (or
12 proved to me under oath or through _____)
13 (description of identity card or other document) to be
14 the person whose name is subscribed to the foregoing
15 instrument and acknowledged to me that they executed the
16 same for the purposes and consideration therein
17 expressed.

18 Given under my hand and seal of office this
19 _____ of _____, 2002.
20

21
22 NOTARY PUBLIC IN AND FOR
23 THE STATE OF _____

24 My Commission Expires: _____
25

DOCKET NO. 25004

Complaint and Request of)
)
 EL PASO NETWORKS, LLC,)
) BEFORE THE PUBLIC
 For Interim Ruling for Post) UTILITY COMMISSION
 Interconnection Agreement) OF TEXAS
 Dispute Resolution With)
 Southwestern Bell Telephone)
 Company)

DOCKET NO. 25188

Petition of)
)
 EL PASO NETWORKS, LLC,)
)
 For Arbitration Pursuant to)
 Section 252(b) of the) BEFORE THE PUBLIC
 Communications Act of 1934,) UTILITY COMMISSION
 as amended by the) OF TEXAS
 Telecommunications Act of)
 1996, and PURA for Rates,)
 Terms, and Conditions of)
 Interconnection Agreement)
 with Southwestern Bell)
 Telephone)

REPORTER'S CERTIFICATION
 DEPOSITION OF SALLY ROSSMAN
 APRIL 11, 2002

I, Nancy P. Blankenship, Certified Shorthand
 Reporter in and for the State of Texas, hereby certify
 to the following:

That the witness, SALLY ROSSMAN, was duly
 sworn by the officer, and that the transcript of the
 oral deposition is a true record of the testimony given
 by the witness;

1 That the deposition transcript was submitted
2 on April 13, 2002, to the witness or to the attorney for
3 the witness for examination, signature and return to me
4 by May 5, 2002.

5 That the amount of time used by each party at
6 the deposition is as follows:

7 MR. STEPHEN CRAWFORD - 1 HOURS, 51 MINUTES

8 MR. FLOYD HARTLEY - 0 HOURS, 0 MINUTES

9 That pursuant to information given to the
10 deposition officer at the time said testimony was taken,
11 the following includes counsel for all parties of
12 record:

13 Mr. Stephen Crawford, Attorney for El Paso Networks, LLC


14 Mr. Floyd Hartley, Attorney for Southwestern Bell
15 Telephone Company

16 I further certify that I am neither counsel
17 for, related to, nor employed by any of the parties or
18 attorneys in the action in which this proceeding was
19 taken, and further that I am not financially or
20 otherwise interested in the outcome of the action.

21 Further certification requirements pursuant to
22 Rule 203 of TRCP will be certified to after they have
23 occurred.

24
25

1 Certified to by me this 13th day of April,
2 2002.

3
4 
5 Nancy P. Blankenship, Certified
6 Shorthand Reporter No. 7351
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15 My commission expires 12/31/02
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